

### **IN THE DRAWINGS**

The applicant request that FIG. 5 in the application be amended as illustrated in the attached replacement drawings. Please refer to the remarks section of this Response for an explanation of the amendments made.

## **REMARKS**

Claims 1-27 are pending in the application.

Claims 1-27 are rejected.

Claims 1-24 are rejected under § 112.

Claims 1-27 are rejected under § 103(a)

Claims 1 and 25 are amended.

No new matter is added.

Applicant requests reconsideration and allowance of the claims in light of the above amendments and following remarks.

### **In the Drawings**

FIG. 5 of the drawings has been amended to correct the link protocol indicated by element indicator 540. As stated on page 9, lines 3-4 of the specification, element 540 refers to an internal link protocol in mesh network 500. The element indicator 540 original pointed to a traffic link outside of the I/O protocol processor 510. This element indicator has been corrected to point to a proper internal link protocol as shown in the replacement drawing included in the appendix.

### **In the Claims**

#### ***Claim Rejection - 35 U.S.C. §112***

Claims 1-24 are rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

In particular, the Examiner asserts that the term “broken” in claims 1-24 is used by the claims to mean “disconnected,” while the accepted meaning is “unused.” The Examiner also asserts that the term is indefinite because the specification does not clearly redefine the term. The Applicant does not agree that the accepted meaning of the term “broken” is “unused,” as asserted by the Examiner. However, this argument does not need to be reached because the term is sufficiently set out in the specification such that it is clearly enough defined so as to put one reasonably skilled in the art on notice of at least one meaning of the term as used in the application and claims. The Applicant specifically refers the Examiner to page 9, lines 2-19 where the specification clearly sets out type of mesh network referred to in addition to illustrating such a mesh network in FIG. 5. Thus, the Applicant submits that the term “broken” is sufficiently defined within the specification as needed to comply with § 112.

The Examiner also asserts that claims 1-24 are vague and indefinite because the term “the other coordinate” is unclear in the sense of which coordinate is described. The Applicant points out that “the other coordinate” is the coordinate value that is not the same coordinate value for the two switching elements, and contend that the language in the claim relating to this term is sufficiently definite as to comply with § 112.

### ***Claim Rejections - 35 U.S.C. §103***

Claims 1-21 and 23-26 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,533,198 issued to Thorson (hereinafter “Thorson”) in view of U.S. Patent No. 6,230,252 issued to Passint et al. (hereinafter “Passint et al.”).

Claims 22 and 27 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Thorson in view of Passint et al., and further in view of U.S. Patent No. 6,836,849 issued to Brock et al. (hereinafter “Brock et al.”).

With respect to claim 1, the Applicant respectfully disagrees that the combination of Thorson in view of Passint teach input output protocol processing blocks as claimed in claim 1. However, in order to advance prosecution, claim 1 has been amended to specify that in input output protocol processing blocks convert an input/output link protocol to an internal link protocol.

In the Office Action it is alleged that the input output protocol processor blocks of claim 1 are disclosed by Thorson (US Patent No. 5,533,198). Referring to Fig. 5 of Thorson, the Examiner relies upon the processor 52 to teach the input output protocol processor 510 of the present invention.

Unlike the processor disclosed in Thorson, however, the input/output protocol processor 510 in Fig. 5 of the present invention converts an input/output link protocol to an internal link protocol 540. All traffic sources and sinks 530 are connected on the boundary of the broken mesh network. The input/output protocol processor 510 of the present invention connects the basic switching element 520 and traffic source and link 530.

In contrast, the processor 52 in Fig. 5 of Thorson is embedded in the switching nodes 42.0 to 42.26 in Fig. 4, respectively. Namely, all of the switching nodes 42.0 to 42.26 have the same construction and the switching nodes 42.0 to 42.26 do not have connection to the local traffic source or sink. Furthermore, the processor 52 of Thorson doesn’t have a protocol conversion function.

As a result, the combination of Thorson and the Passint does not disclose or suggest “input output protocol processor blocks,” and therefore cannot properly render claim 1

obvious. As mentioned above, however, claim 1 has been amended to further emphasize these differences. Accordingly, the Applicant submits that claim 1 is in proper form for allowance, and requests that the rejection of claim 1 be withdrawn.

Claims 2-24 depend from claim 1. As mentioned above, the combination of Thorson in view of Passint does not teach or otherwise suggest all of the limitations of claim 1. In addition, Brock does not disclose these untaught limitations. Thus, based at least in part on their dependency, the Applicant submits that claims 2-24 are likewise in proper form for allowance.

Claim 25 has been amended to specify that the protocol processing block converts an input/output link protocol to an internal link protocol. As discussed above with respect to claim 1, neither Thorson nor Passint teach or otherwise suggest this feature. Thus, because the combination of Thorson in view of Passint does not teach or otherwise suggest all of the limitations of claim 25, the combination of Thorson in view of Passint cannot render claim 25 obvious. As such, the Applicant submits that claim 25 is in proper form for allowance, and requests that the rejection under § 103(a) be removed.

Claims 26 and 27 depend from claim 25. As mentioned above, the combination of Thorson in view of Passint does not teach or otherwise suggest all of the limitations of claim 25. In addition, Brock does not disclose these untaught limitations. Thus, based at least in part on their dependency, the Applicant submits that claims 26 and 27 are likewise in proper form for allowance.

*Conclusion*

For the foregoing reasons, reconsideration and allowance of all pending claims of the application as amended is requested. The Examiner is encouraged to telephone the undersigned at (503) 222-3613 if it appears that an interview would be helpful in advancing the case.

Respectfully submitted,

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